



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

July 28, 2006

Certified Mail No. 7005 1160 0000 1550 6698

David Hines, Plant Manager
McCain Foods, Inc.
P. O. Box 10
Burley, Idaho 83318

RE: Facility ID No. 031-00014, McCain Foods, Inc., Burley
Final Modified Tier II Operating Permit and Permit to Construct

Dear Mr. Hines:

The Idaho Department of Environmental Quality (DEQ) is issuing a modified Tier II Operating Permit and Permit to Construct (PTC) Number P-060405 to McCain Foods, Inc. (McCain) for its Burley facility in accordance with IDAPA 58.01.01.400 through 406 and 200 through 228, Rules for the Control of Air Pollution in Idaho. McCain requested to modify Tier II Operating Permit No. T2-050423, issued December 27, 2005, and the PTC No. P-030423, issued April 7, 2004. DEQ included PTC No. P-030423 in this permit.

The enclosed permit is effective immediately and is based on the information contained in your permit application. This Tier II operating permit and permit to construct replaces the Tier II Operating Permit and Permit to Construct No. T2-050423, issued December 27, 2005, and PTC No. P-030423, issued April 7, 2004, the terms and conditions of which no longer apply.

This permit does not release McCain from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of DEQ's Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/HE/bf

Permit No. P-060405

Enclosures

c: Steve VanZandt, Twin Falls Regional Office
 Harbi Elshafei, AQ Analyst 3
 Bill Rogers, Permit Coordinator
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Laurie Kral, US EPA Region 10
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
TIER II OPERATING PERMIT
And
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-060405

FACILITY ID No.: 031-00014

AQCR: 64

CLASS: SM80

SIC: 2037

ZONE: 12

UTM COORDINATE (km): 266.7, 4,712.8

1. PERMITTEE

McCain Foods, Inc.

2. PROJECT

Facility-Wide Tier II Operating Permit and Permit to Construct Modification

3. MAILING ADDRESS

P.O. Box 10

CITY

Burley

STATE

ID

ZIP

83318

4. FACILITY CONTACT

Bill Fowler

TITLE

Environmental Control Supervisor

TELEPHONE

(208) 678-6729

5. RESPONSIBLE OFFICIAL

David Hines

TITLE

Plant Manager

TELEPHONE

(208) 678-6723

6. EXACT PLANT LOCATION

218 W. Highway 30

COUNTY

Cassia

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Production of frozen food (potato) products

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with Section 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.


TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

December 7, 2002

Date Modified/Revised:

July 28, 2006

Date Expires:

November 7, 2007

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Acronyms, Units, and Chemical Nomenclatures

ASTM	American Society for Testing and Materials
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
H₂S	hydrogen sulfide
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
NO_x	oxides of nitrogen
O&M	operations and maintenance
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
MMscf/yr	million standard cubic feet per year
SIC	Standard Industrial Classification
SO₂	sulfur dioxide
T/day	tons per day
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: P-060405

Permittee:	McCain Foods Inc.	Facility ID No: 031-00014	Date Issued:	November 7, 2002
Location:	Burley, Idaho		Date Modified/Revised:	July 28, 2006
			Date Expires:	November 7, 2007

1. PERMIT SCOPE

Purpose

- 1.1 This Tier II operating permit and permit to construct is a modification to the facility's permit. This permit allows for the combustion of biogas in the Murray 1 boiler (B101) and the Nebraska 1 boiler (B102).
- 1.2 This Tier II operating permit and permit to construct replaces the following permits, the terms and conditions of which no longer apply:
- Tier II Operating Permit and Permit to Construct No. T2-050423, issued December 27, 2005.
 - Permit to construct No. P-030423, issued April 7, 2004.
 - Tier II Operating Permit and Permit to Construct No. 031-00014, issued November 7, 2002.
 - PTC No. 0440-0014 issued August 19, 1982; and modified June 25, 1985.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Sections	Source Description	Emissions Control(s)
2	Facility-wide (fugitive and point sources)	Reasonable control
3	(B101)Murray 1 boiler, Model: MCF4-78, 100 MMBtu/hr, natural gas and biogas	None
	(B102) Nebraska 1 boiler, Model: NS-E-68, 95.58 MMBtu/hr, natural gas and biogas	None
	(B202) Nebraska 2 boiler, Model: NS-E-57, 78.05 MMBtu/hr, natural gas	None
	(B203) Murray 2 boiler, Model: MCF2-38, 39.1 MMBtu/hr, natural gas	None
	(C001) Biogas flare, Varec, Model: 244W	None
4	(D109 - D111) Prime 1 dryer, Wolverine Proctor, steam heated	None
	(D107) Tot dryer, Rey Industries, 4 MMBtu/hr, direct-fired dryer, natural gas	None
	(D205- D208) Prime 2 dryer, National, 48 MMBtu/hr, direct-fired dryer, natural gas	None
5	(F103) Tot fryer, Shockey Model: Ore-Ida	Air washer, Rey Industries Model: G12/24, 20 gpm
	(F104) Prime 1 fryer, Shockey Model: Ore-Ida	Air washer, Ore-Ida, 20 gpm
	(F108) Parfry fryer, Idaho Steel Products Model: Ore-Ida	Air washer, Rey Industries, 20
	(F204) Prime 2 fryer, heat and control	Air washer, Ore-Ida, 20 gpm
6	(E209) Batter Room collector	Dust collector
7	(E001) Emergency fire pump, Detroit Diesel Model: 6061-A2, No. 1 or No. 2 fuel oil	None

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct quarterly facility-wide inspections of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time odors were present (if observed), any corrective action taken in response to the odors, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed) any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, in accordance with IDAPA 58.01.01.600-616.

Fuel-burning Equipment

- 2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

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Air Pollution Emergency Rule

- 2.12 The permittee shall comply with the Air Pollution Emergency Rule , in accordance with IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping

- 2.13 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All monitoring records required by this permit shall remain on site for the most recent five year period and shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.14 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance
Twin Falls Regional Office
Department of Environmental Quality
1363 Fillmore Street
Twin Falls, ID 83301
Phone: (208) 736-2190

Fax: (208) 736-2194

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3. BOILERS AND BIOGAS FLARE

3.1 Process Description

There are four boilers existing at the facility and are used to generate steam for the manufacturing process. Two of the units, the Murray 1 boiler and the Nebraska 1 boiler, are located in Burley Plant 1. The Murray 1 boiler has a maximum heat input capacity of 100 MMBtu/hr. The Nebraska 1 boiler has a maximum heat input capacity of 95.58 MMBtu/hr. The Murray 1 boiler and Nebraska 1 boiler combust both natural gas as primary fuel and biogas as secondary fuel. The remaining two boilers, the Nebraska 2 boiler and the Murray 2 boiler, are located in Burley Plant 2. The Nebraska 2 boiler has a maximum heat input capacity of 78.05 MMBtu/hr. The Murray 2 boiler has a maximum heat input capacity of 39.1 MMBtu/hr. The Murray 2 boiler and Nebraska 2 boiler combust only natural gas as fuel.

The biogas flare incinerates the gases created in McCain foods' anaerobic lagoon. The flare is a Varec Model 244W Series.

3.2 Control Description

Emissions from all the boilers are uncontrolled.

Table 3.1 EMISSIONS UNIT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Murray 1 boiler	None	B101
Nebraska 1 boiler	None	B102
Nebraska 2 boiler	None	B202
Murray 2 boiler	None	B203
Biogas flare	None	C001

Emissions Limits

3.3 Emissions Limits

- The aggregate PM₁₀, NO_x, CO, and VOC emissions from the boiler stacks (B101, B102, B202, B203) shall not exceed any corresponding emissions rate limits listed in the appendix of this permit. **[PTC Condition]**
- The aggregate SO₂ emissions from the boiler stacks (B101, B102, B202, and B203) and the biogas flare (C001) shall not exceed 99.86 tons per any consecutive 12-month period (T/yr).
- Emissions of H₂S from the boiler stacks (B101 and B102) and the biogas flare (C001) shall not exceed 6.0 lb/day
- Emissions of H₂S from the boiler stacks (B101 and B102) and the biogas flare (C001) shall not exceed 1.1 T/yr.

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3.4 Biogas Flare Particulate Matter Emissions Limit

Particulate matter (PM) emissions from the biogas flare shall not exceed 0.2 pounds per 100 pounds of biogas burned, as required by IDAPA 58.01.01.785.

[PTC Condition]

Operating Requirements**3.5 Requirements to Install Biogas Flare and to Combust Anaerobic Lagoon Emissions**

The permittee shall install, calibrate, maintain, and operate a biogas flare for the combustion of the biogas emitted from the anaerobic lagoon. All emissions of air pollutants from the anaerobic lagoon shall be combusted in either boilers (B101 or B102) or the biogas flare.

[PTC Condition]

3.6 Pilot Flame and Alarm

The flare shall be operated with a pilot flame present during the operation of the digester. In the event of a flame failure, the permittee shall follow a standard operating procedure to reinitiate the pilot flame as expeditiously as practicable.

Within 60 days of issuance of this permit, the permittee shall install a thermocouple or similar device that detects the presence of a flame in the biogas flare. This device shall be periodically calibrated and shall be operated at all times when the flare is operating. In addition, the permittee shall install an alarm that notifies the operator in the case of a flameout within 60 days of issuance of this permit. The permittee shall follow the excess emissions procedures in IDAPA 58.01.01.130-136 in the event of an excess emissions event caused by the biogas flare.

[PTC Condition]

3.7 Natural Gas Fuel Usage Limit

The maximum amount of natural gas combusted by the boilers collectively shall not exceed 1,100 MMscf/yr for any consecutive 12-month period.

[PTC Condition]

3.8 Natural Gas Fuel Meter

Within 180 days of the issuance of this permit, the permittee shall install, calibrate, maintain, and operate a natural-gas flow meter to measure the amount of natural gas combusted in the boilers (B101, B102, B202, B203) collectively.

[PTC Condition]

3.9 Fuel Type

- The Murray 1 boiler and Nebraska 1 boiler, with a maximum total rated heat input capacity of 196 MMBtu/hr, shall be fueled with either natural gas or a mixture of biogas and natural gas exclusively.
- The Murray 2 boiler and Nebraska 2 boiler, with a maximum total rated heat input capacity of 117 MMBtu/hr, shall be fueled on natural gas exclusively.

[PTC Condition]

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Monitoring and Recordkeeping Requirements

3.10 Natural Gas Fuel Usage Monitoring Requirement

The permittee shall monitor and record the amount of natural gas combusted by the boilers, collectively, daily, monthly, and annually to demonstrate compliance with Permit Condition 3.7. The amount of natural gas combusted shall be recorded in units of standard cubic feet. Each daily amount of natural gas combusted shall be summed monthly, and then each month's amount of natural gas combusted shall be summed over the previous consecutive 12-month period.

[PTC Condition]

3.11 Biogas Flow Rate and H₂S Concentrations Monitoring

Unless an alternative monitoring and recordkeeping method is approved by DEQ, the permittee shall comply with the following requirements:

Biogas H₂S Concentrations

The permittee shall perform the following to determine the quantity of hydrogen sulfide (H₂S) produced by the anaerobic lagoon:

- Within 120 days of issuance of this permit, the permittee shall install, calibrate, maintain, operate, and record an H₂S gas monitor that shall be placed upstream of boilers (B101 and B102) and the biogas flare to measure the H₂S concentrations in the biogas produced by the anaerobic lagoon. The monitor shall be installed in accordance with the O&M manual and the manufacturer specifications.
- Calibration of the H₂S monitor shall be performed and recorded semi-annually.
- The results of the H₂S concentrations from the H₂S monitor shall be recorded once per week.

Biogas Flow Rate Monitoring

The permittee shall install, calibrate and operate a biogas flow meter that shall be placed after the outlet of the covered anaerobic lagoon to determine the quantity of biogas produced by the lagoon. The permittee shall monitor and record the total biogas flow rate on a weekly basis.

[PTC Condition]

H₂S and SO₂ Emission Estimates

The permittee shall estimate H₂S and SO₂ emissions according to the following methods:

- The monthly SO₂ emissions and H₂S emissions from the flare and the boilers (B101 and B102) shall be calculated using the average H₂S concentration readings of all H₂S samples taken for each week, and the corresponding weekly biogas flow. The calculations shall be conducted using a similar method as in the permit application, including a molar conversion of H₂S to SO₂, a 98% H₂S control efficiency and 98% conversion of H₂S to SO₂ for the flare; and, a 98% H₂S control efficiency, and a 98% conversion of H₂S to SO₂ emissions for the boilers (B101 and B102).

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- Monthly SO₂ emissions shall be used to determine rolling 12-month total SO₂ emissions.
- Monthly H₂S emissions shall be used to determine the rolling 12-month H₂S emissions.

3.12 Operations and Maintenance Manual

Within 120 days of issuance of this permit, the permittee shall develop an operations and maintenance (O&M) manual which describes the procedures that will be followed to maintain the anaerobic lagoon in good working order and assure operation as efficiently as practical for the H₂S monitor and the pilot flame detector. The procedures and specifications described in the O&M manual shall address, at a minimum, the following topics:

H₂S Monitor

- Standard operational procedure for H₂S sampling
- Frequency and method of calibration
- Operational maintenance
- Procedures for upset/breakdown conditions and for correcting equipment malfunctions

Pilot Flame Detector

- Method of ensuring continuous operation
- Operational maintenance

Within 120 days of issuance of this permit, a copy of the O&M manual shall be submitted to the DEQ Twin Falls Regional Office at the address listed in Permit Condition 2.14.

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4. DRYERS**4.1 Process Description**

McCain Foods currently operates two process lines for Prime Products, one in each plant. Dryers are utilized to reduce the moisture content of the potato products prior to frying. The two dryers that are operated in conjunction with the Prime Products lines are as follows: the Prime 1 dryer is steam heated (Burley Plant 1) and the Prime 2 dryer (Burley Plant 2) is direct-fired dryer and fueled by natural gas. The Prime 1 dryer vents directly to the atmosphere via three separate stacks (D109 - D111). The Prime 2 dryer vents to the atmosphere through four separate stacks (D205 - D208). Tater Tots are manufactured in Burley Plant 1. The Tot dryer is a direct, natural gas-fired dryer that removes moisture from the potatoes. The Tot dryer vents directly to the atmosphere via a vertical stack (D107).

4.2 Control Description

Emissions from the Prime Product dryers are uncontrolled.

Table 4.1 EMISSIONS UNIT DESCRIPTION

Emissions Unit(s) /Process(es)	Emissions Control Device	Emissions Point
Prime 1 dryer	None	D109, D110, D111
Prime 2 dryer	None	D205, D206, D207, D208
Tot dryer	None	D107

Emissions Limits**4.3 Emissions Limits**

Particulate matter, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the dryer stacks (D109 - D111, D205, D206, D207, D208, D107) shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC Condition]

Operating Requirements**4.4 Throughput Limits****Prime 1 Dryer**

- The maximum throughput of the Prime 1 dryer shall not exceed 642 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Prime 1 dryer shall not exceed 173,340 tons of finished potato product per any consecutive 12-month period.

Prime 2 Dryer

- The maximum throughput of the Prime 2 dryer shall not exceed 540 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Prime 2 dryer shall not exceed 145,800 tons of finished potato product per any consecutive 12-month period.

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Tot Dryer

- The maximum throughput of the Tot dryer shall not exceed 192 T/day of finished potato product based on a monthly average.
- The maximum annual throughput of the Tot dryer shall not exceed 51,840 tons of finished potato product per any consecutive 12-month period.

[PTC Condition]**4.5 Fuel Usage Limits**

- The maximum amount of natural gas combusted in the Prime 2 dryer shall not exceed 120 MMscf, or 1,224,000 therms, per any consecutive 12-month period.
- The maximum amount of natural gas combusted in the Tot dryer shall not exceed 30 MMscf, or 306,000 therms, per any consecutive 12-month period.

[PTC Condition]**4.6 Fuel Meter**

Within 180 days of the issuance of the permit, the permittee shall install, calibrate, maintain, and operate a natural-gas flow meter to measure the amount of natural gas combusted in the Prime 2 dryer and the Tot dryer.

[PTC Condition]**4.7 Fuel Type**

The Prime 2 dryer and Tot dryer shall be fueled on natural gas exclusively.

[PTC Condition]**Monitoring and Recordkeeping Requirements****4.8 Throughput Monitoring**

The permittee shall monitor and record the finished potato product throughput of the Prime 1 dryer, the Prime 2 dryer, and the Tot dryer daily, monthly, and annually to demonstrate compliance with Permit Condition 4.4. Throughput shall be measured at the packaging step of each process line, and "day" shall mean a 24-hour period. The throughput of each dryer shall be monitored and recorded daily. The daily throughputs of each dryer shall be summed and recorded monthly. The monthly throughputs of each dryer shall be summed and recorded for the previous consecutive 12-month period.

[PTC Condition]**4.9 Fuel Usage Monitoring Requirement – Prime 2 Dryer and Tot Dryer**

The permittee shall monitor and record the amount of natural gas combusted by the Prime 2 dryer and the Tot dryer daily, monthly, and annually to demonstrate compliance with Permit Condition 4.5. The amount of natural gas combusted shall be recorded in units of standard cubic feet or therms. Each daily amount of natural gas combusted shall be summed monthly, and then each month's amount of natural gas combusted shall be summed over the previous consecutive 12-month period.

[PTC Condition]

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5. FRYERS**5.1 Process Description**

After being dried, the potato products are conveyed to the fryers in which they are cooked in hot vegetable oil. The two fryers used for Prime Products are as follows: Prime 1 fryer (Burley Plant 1) and the Prime 2 fryer (Burley Plant 2). The fryers are heated by steam. Each fryer is equipped with an air washer that is essentially a spray-chamber scrubber. In the air washer, exhaust from the fryer is passed through a chamber and contacted with a water spray that saturates the air stream. This allows the PM to attach to the water droplets. The water droplets carrying the PM are separated from the exhaust stream by a bank of stainless steel eliminator blades. The Prime 1 fryer air washer vents to the atmosphere through a single vertical stack (F104). The Prime 2 fryer air washer vents to the atmosphere through a single vertical stack (F204). The tots are conveyed to the Tot fryer where they are cooked in hot vegetable oil. The fryer is heated by steam. The fryer is equipped with an air washer that removes PM from the exhaust stream. The Tot fryer air washer vents to the atmosphere through a single vertical stack (F103). The parfry patties are cooked in the Parfry fryer. The fryer is heated by steam. The fryer is equipped with an air washer that removes PM from the exhaust stream. The Parfry fryer air washer vents to the atmosphere through a single vertical stack (F108).

5.2 Control Description

Emissions from the Prime dryers are uncontrolled.

Table 5.1 EMISSIONS UNIT DESCRIPTION

Emissions Unit(s)/ Process(es)	Emissions Control Device	Emissions Point
Prime 1 fryer	Air washer	F104
Prime 2 fryer	Air washer	F204
Tot fryer	Air washer	F103
Parfry fryer	Air washer	F108

Emissions Limits**5.3 Emissions Limits**

Particulate matter, PM₁₀, and VOC emissions from the fryer stacks (F104, F204, F103, F108) shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC Condition]

Operating Requirements**5.4 Throughput Limits****Prime 1 Fryer**

- The maximum throughput of finished potato product for the Prime 1 fryer shall not exceed 642 T/day based on a monthly average.

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- The maximum throughput of finished potato product for the Prime 1 fryer shall not exceed 173,340 tons per any consecutive 12-month period.

Prime 2 Fryer

- The maximum throughput of finished potato product for the Prime 2 fryer shall not exceed 540 T/day based on a monthly average.
- The maximum throughput of finished potato product for the Prime 2 fryer shall not exceed 145,800 tons per any consecutive 12-month period.

Tot Fryer

- The maximum throughput of finished potato product for the Tot fryer shall not exceed 192 T/day based on a monthly average
- The maximum throughput of finished potato product for the Tot fryer shall not exceed 51,840 tons per any consecutive 12-month period.

ParFry Fryer

- The maximum throughput of finished potato product for the Parfry fryer shall not exceed 61.2 T/day based on a monthly average.
- The maximum throughput of finished potato product for the Parfry fryer shall not exceed 16,524 tons per any consecutive 12-month period.

[PTC Condition]**5.5 Air Pollution Control Equipment**

The fan and the spray-water pump associated with each air washer shall be operated per the instructions provided in the O&M manual. The pressure at the header of the air washer shall also be set per the specifications identified in the O&M manual by adjusting the pump discharge valve.

The air-washer system shall be maintained on a routine basis in accordance with the schedule recommended in the O&M manual. Maintenance activities shall include, but not be limited to, the following: cleaning and replacing the spray-water nozzles, pressure pump maintenance, and cleaning the eliminator blades.

Monitoring and Recordkeeping Requirements**5.6 Throughput Monitoring**

The permittee shall monitor and record the finished potato product throughput of the Prime 1 fryer, the Prime 2 fryer, the Tot fryer, and the ParFry fryer daily, monthly, and annually to demonstrate compliance with Permit Condition 5.4. Throughput shall be measured at the packaging step of each process line, and "day" shall mean a 24-hour period. The throughput of each fryer shall be monitored and recorded daily. The daily throughputs of each fryer shall be summed and recorded monthly. The monthly throughputs of each fryer shall be summed and recorded for the previous consecutive 12-month period.

[PTC Condition]

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5.7 Air Pollution Control Parameters

The permittee shall monitor and record the parameters listed below to demonstrate compliance with air pollution control equipment requirements for Prime 1 fryer air washer, Prime 2 fryer air washer, the Tot fryer air washer, and the Parfry fryer air washer.

- Air-washer fan is operable. Verify once daily and record status.
- Spray-water pump is operable. Verify once daily and record status.
- Spray-water pump pressure. Measure once daily and record pressure.
- Maintenance activities. Record date and description.

5.8 Operations and Maintenance Manual

Within 180 days of issuance of this permit, the permittee shall have developed an O&M manual for the fryer air washers (air pollution control devices). The O&M manual shall describe the procedures that will be followed to insure proper operation of the fryer air washers. The O&M manual is developed at the time of issuing this permit revision.

[PTC Condition]

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6. BATTER ROOM

6.1 Process Description

Several of the potato products are battered. The batter is prepared from various dry ingredients, such as flour and seasonings, in a designated room located in Burley Plant 2. Particulate matter is filtered from the air in the Batter Room by a dust-collection system.

6.2 Control Description

Emissions from the Batter Room are controlled by a package baghouse unit that consists of a group of filter elements that are mounted in an airbox. Exhaust from the dust-collection system is vented to the atmosphere via a horizontal duct (E209).

Table 6.1 EMISSIONS UNIT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Batter Room	Dust collector (baghouse)	E209

Emissions Limits

6.3 Emissions Limits

The PM₁₀ emissions from the Batter Room stack shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC Condition]

Operating Requirements

6.4 Baghouse Pressure Drop

The pressure drop across the baghouse shall be maintained within manufacturer specifications.

Monitoring and Recordkeeping Requirements

6.5 Baghouse

The permittee shall inspect the Batter Room dust-collector filters once per month for tears and holes. The filters shall be replaced as needed. The filter status shall be recorded.

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7. EMERGENCY FIRE PUMP**7.1 Process Description**

A diesel fire pump is utilized to create water pressure for emergency fire-fighting efforts. The 170-horsepower pump is connected to the Snake River and is located in a small building north of Burley Plant 1. In addition to emergency situations, the emergency fire pump is operated once a week, for approximately two hours, to insure that the unit is functioning properly. The exhaust is discharged to the atmosphere by means of a horizontal stack (E001) located on the north side of the fire pump house.

7.2 Control Description

Emissions from the emergency fire pump are uncontrolled.

Table 7.1 EMISSIONS UNIT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Emergency fire pump	None	E001

Emissions Limits**7.3 Emissions Limits**

Particulate matter, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the emergency fire pump stack (E001) shall not exceed any corresponding emissions rate limits listed in this permit.

[PTC Condition]

Operating Requirements**7.4 Hours of Operation**

The maximum hours of operation for the emergency fire pump shall not exceed two hours per week, except during an emergency. The total number of hours of operation for the emergency fire pump shall not exceed 104 hours for any consecutive 12-month period, except during an emergency.

[PTC Condition]

7.5 Fuel Specification

The emergency fire pump shall be fired exclusively by distillate fuel oil exclusively.

[PTC Condition]

7.6 Distillate Fuel Oil Sulfur Content Limit

- The sulfur content of ASTM Grade 1 fuel oil shall not exceed 0.3% by weight.
- The sulfur content of ASTM Grade 2 fuel oil shall not exceed 0.5% by weight.

[PTC Condition]

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Monitoring and Recordkeeping Requirements**7.7 Hours of Operation Monitoring Requirement**

The permittee shall monitor and record the date and the number of hours of operation of the emergency fire pump to demonstrate compliance with Permit Condition 7.4.

[PTC Condition]

7.8 Fuel Oil Sulfur Content Monitoring Requirement

The permittee shall demonstrate compliance with Permit Condition 7.6 by obtaining documentation of the sulfur content analysis for each shipment of distillate fuel oil (ASTM Grade 1 fuel oil and ASTM Grade 2 fuel oil) on an as-received basis. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

[PTC Condition]

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8. APPENDIX – EMISSION RATE LIMITS

The following table provides the emission rate limits for specific sources regulated in this permit:

Table 8.1 EMISSIONS RATE LIMITS

MCCAIN FOODS, BURLEY										
Emission Limits^a - Hourly^b (lb/hr), and Annually^c (T/yr)										
Source Description	Hourly PM₁₀^d Emissions (lb/hr)	Annual PM₁₀^d Emissions (T/yr)	NO_x		CO		VOC		SO₂	
			lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
(B101) Murray 1 boiler	0.75	4.88	--	64.16	--	53.90	--	3.53	--	99.86
(B102) Nebraska 1 boiler	0.71		--		--		--		--	
(B202) Nebraska 2 boiler	0.58		--		--		--		--	
(B203) Murray 2 boiler	0.29		--		--		--		--	
(C001) Biogas Flare	0.16		--		--		--		--	
(D109, D110, D111) Prime 1 dryer	6.69	21.67	--	--	--	--	--	--	--	--
(D107) Tot dryer	2.00	6.48	--	2.30	--	5.60	--	0.08	--	0.01
(D205 – D208) Prime 2 dryer	5.63	18.23	--	9.18	--	22.38	--	0.33	--	0.04
(F103) Tot fryer	4.08	13.22	--	--	--	--	--	3.89	--	--
(F104) Prime 1 fryer	2.68	8.67	--	--	--	--	--	8.67	--	--
(F108) Parfry fryer	1.30	4.21	--	--	--	--	--	1.24	--	--
(F204) Prime 2 fryer	2.25	7.29	--	--	--	--	--	7.29	--	--
(E209) Batter Room collector	0.12	0.53	--	--	--	--	--	--	--	--
(E001) Emergency fire pump	0.37	0.02	--	0.27	--	0.06	--	0.02	--	0.02

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b Hourly limits are a 24-hour average.

^c As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^d Includes condensibles.

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9. TIER II PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.